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11 *ByteDance Inc.*, *ByteDance Ltd.*,
12 *TikTok Ltd.*, and *TikTok LLC*

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:

ALL ACTIONS

MDL No. 3047

Case No. 4:22-md-03047-YGR

Honorable Yvonne Gonzalez Rogers

**DECLARATION OF JAMES GATLIN IN
SUPPORT OF THE TIKTOK
DEFENDANTS' OMNIBUS MOTION TO
SEAL PORTIONS OF EXHIBIT C TO
PLAINTIFFS' SECOND AMENDED
MASTER COMPLAINT (PERSONAL
INJURY)**

1 I, James Gatlin, do hereby declare and state as follows:

2 1. I am over the age of 18 and competent to make this declaration. I make this
 3 declaration based upon my personal knowledge, unless stated otherwise, and if called upon to do
 4 so, I could and would so testify.

5 2. I am United States Data Security Child Safety Team (CST) Manager for TikTok
 6 and have been with TikTok since October 2019. Among other things, my team is responsible for
 7 (a) reviewing any escalation of content on the TikTok platform to determine if it contains child
 8 sexual abuse materials (CSAM); (b) preserving and reporting information to the National Center
 9 for Missing & Exploited Children (NCMEC) that are detected on the TikTok platform pursuant to
 10 18 U.S.C. § 2258A (known as the Protect Our Children Act (PROTECT Act)); and (c) taking any
 11 action warranted on the account and the user. I submit this declaration in support of Defendants'
 12 Omnibus Motion to Seal Portions of Exhibit C to Plaintiffs' Second Amended Master Complaint
 13 (Personal Injury). This declaration is based on my personal knowledge and experience at TikTok
 14 and in my career.

15 3. The following portions of Exhibit C to Plaintiffs' Second Amended Master
 16 Complaint (Personal Injury) that the TikTok Defendants have moved to maintain under seal
 17 contain excerpts and discussion of information that could enable online predators and other bad
 18 actors to avoid detection and/or enforcement on TikTok's services:

Document	Paragraph / Figure
Exhibit C	¶ 104 (after "accounts 'where'" until "but when"; after "but when" until "is obviously"; and after "dedicated to")
Exhibit C	¶ 105 (after "failure to monitor" until "an optimal"; after "accounts who" until "See Figure 9"; and after "memo titled")
Exhibit C	Figure 9

4. The above-listed information concerns TikTok's detection, reporting, and prevention systems, policies, and processes regarding child sexual exploitation, including CSAM.

3 5. The above-listed information is highly sensitive and TikTok does not publicly
4 reveal it.

5 6. Public disclosure of the above-listed information could enable online predators and
6 other bad actors to evade detection and/or enforcement.

7 7. Predators and other bad actors can be highly sophisticated, work together, share
8 information with one another, and use constantly evolving tactics to seek to circumvent safety
9 mechanisms. For example, groups of predators create and disseminate comprehensive guides on
10 how to locate, contact, exploit, and abuse minors, as well as how to avoid detection.

12 I declare under penalty of perjury under the laws of the United States of America that the
13 foregoing is true and correct. This Declaration is executed this 18th day of January, 2024, at Culver
14 City, California.

James Gatlin
JAMES GATLIN